Support ACR 7

Making the Aleutian Islands state waters exclusive for Pacific Cod.

The Aleutian Island's state water cod fishery is the only developed fishery, that doesn't have an exclusive or super exclusive registration. Over the history of state waters fisheries, these designations have been adopted by area to provide stability to regions that faced increased effort and compressed seasons.

We have fished cod since the mid 1980s. We were one of a handful of original boats that caught the qualifying quota establishing a robust state water fishery in the central gulf, which allowed for the state TAC to reach it's 25 %. Over the years, we've pot fished cod in Kodiak, Chignik, Sand Point, Dutch Harbor, Akutan and Adak.

Any state waters harvester that has participated in more than one area or has considered doing so, understands and manages operating under the exclusive/super exclusive designations. This management tool is common. Similar to the state water salmon fishery, it requires the harvester to choose an area/region where they feel they can be the most productive. These choices are driven by multiple factors, including; quota, markets, effort, and proximity to home. These factors are taken into consideration by the individual so they can make a sound business decision.

When you consider fishing the Aleutian Islands, you accept that there is a higher cost of doing business. Your fuel, bait, groceries, and supplies will simply be more costly. This makes it important to be able to project potential effort in the fishery. Up until 2019, the number of participants that crossed over from Dutch Harbor was consistent. The average number over the last seven years was less than one vessel. We would like to highlight that in 2016, where the Departments table 7.1 shows two vessels had crossed over, those vessels were waiting for a processor to show up in Adak. Their original intent was to fish the entire season in the Aleutians and would not have crossed over otherwise. We know this to be accurate as one of those vessels belong to us. In 2019, six vessels crossed over. This was a dramatic increase, it not only shortened the season, but reduced landing tax to the local community, reduced processing workers' hours, added hard ship for the processor in their attempts to a) anticipate length of operations which enables them to offer employment for an expected period of time, b) purchase supplies/groceries/bait/goods for a reasonable determined timeframe.

In the last couple years, several factors have created a new concern for communities in the Aleutian Islands. The fleet in area O has grown and even though their quota share has been generously increased-their season has compressed and is over much faster than the AI fishery. There are several reasons that contribute to this. The AI has a trip limit of 150,000 lbs. This trip limit is intended to enhance quality and a provide a steady pace for the fishery. It also prevents this fleet from performing at the rate of it's neighbors in area O. AI also has an unique small trawler participation, trigger dates for additional trawl participation and for pot vessels over 60 feet. All these tools are to prevent stranded fish, but are also complications to the business model for harvester and processor.

The Aleutian Islands harvesters need the exclusive designation to stabilize the dynamics of the fishery. Fishing in Adak only makes sense if you can project overall effort in a meaningful way. We believe last year was an indication of what to expect from vessels participating in Area O. Right now there is no mechanism to prevent boats from extracting fish from both areas. In the past, this was fine in a fishery not being fully utilized. As state waters fisheries develop and mature, the Board of Fish has determined

over and over again, that exclusive designations are necessary for the local economy and for the participants willing to commit to that area. In closing, we are simply asking for the same stability afforded all other developed state water fisheries. We would also request the Board use March 15th as a tool to lift the exclusive designation, if there is a possibility of stranded fish, determined by the Department.

Ron Kavanaugh 1533 Sawmill Circle Kodiak Alaska 99615